

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PABLO STAR LTD.; PABLO STAR MEDIA LTD.,

Plaintiffs,

v.

THE WELSH GOVERNMENT; VISIT WALES; TRIBUNE CONTENT AGENCY, LLC; PITTSBURGH POST-GAZETTE; E.W. SCRIPPS, CO.; JOURNAL MEDIA GROUP, INC.; TREASURE COAST NEWSPAPERS; COLORADO NEWS FEED; TRAVEL SQUIRE; RICHMOND TIMES DISPATCH; and MIAMI HERALD MEDIA CO.,

Defendants.

Case No. 15-cv-1167 (JPO)

Hon. J. Paul Oetken

ECF Case
Electronically Filed


DECLARATION OF NATHANIEL A. KLEINMAN

I, Nathaniel A. Kleinman, an attorney duly admitted to practice before this Court, do hereby declare under penalty of perjury as prescribed in 28 U.S.C. § 1746, as follows:

1. I am one of the attorneys for Plaintiffs in this action. I have personal knowledge of the facts contained in this declaration and am competent to testify to them.
2. Attached hereto as Exhibit 1 is a true and correct copy of a pdf of a panel from “The Welsh in America” exhibition produced by the Welsh Government in America agency.
3. Attached hereto as Exhibit 2 is a true and correct copy of a pdf photo of “The Welsh in America” exhibition in Alberta, Canada.
4. Plaintiffs’ counsel has sought the services of a professional, specialized foreign process server and can/will immediately effectuate service of the Amended Complaint and summons on the Welsh Government as required under the Hague Convention should the Court grant reconsideration and reverse its venue ruling.

I hereby declare, under penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York
March 30, 2016

By: 
Nathaniel A. Kleinman